

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE McLEAN, VA 22102 PHONE 703.905.2800 FAX 703.905.2820

www.wileyrein.com

September 13, 2010

Nancy J. Victory 202.719.7344 nvictory@wileyrein.com

VIA ELECTRONIC FILING

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Federal-State Joint Board on Universal Service, High Cost Universal Service

Support

CC Docket No. 96-45 WC Docket No. 05-337

Connect America Fund WC Docket No. 10-90

National Broadband Plan GN Docket No. 09-51

Dear Ms. Dortch:

On September 10, 2010, Thomas Navin, Henry Rivera, and the undersigned, on behalf of the Puerto Rico Telephone Company, Inc. ("PRT"), met with Edward P. Lazarus, Chief of Staff for Chairman Genachowski, Zac Katz, Legal Advisor for Wireline Communications for Chairman Genachowski, and Phoebe Yang, Senior Advisor on Broadband for Chairman Genachowski, regarding the above-captioned proceedings. PRT representatives discussed the Commission's recent Sixth Broadband Deployment Report and the finding that more Americans without access to broadband live in Puerto Rico than in any other U.S. state or territory. We explained that the high costs of serving an insular area combined with the exceedingly poor population on the island made deployment of broadband in Puerto Rico generally uneconomic in most areas without federal funding. PRT representatives noted that the company has offered two solutions to this problem, both of which are pending before the agency. The first is the establishment of a non-rural insular fund for high cost loop support, as requested in a petition for reconsideration in WC Docket No. 05-337. The second is a pilot program for funding broadband deployment through competitive procurements, which PRT proposed in its comments in response to the Connect America Fund NOI/NPRM in WC Docket No. 10-90. Representatives of PRT urged the Commission to move forward swiftly with either or both of these alternatives to enable the people of Puerto Rico to access telecommunications and information services currently enjoyed by most



Ms. Marlene H. Dortch September 13, 2010 Page 2

Americans in the mainland U.S. Doing so is necessary for Puerto Rico's future and is required by the Communications Act.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Nancy J. Victory

Nancy J. Victory

cc: Edward P. Lazarus

Zac Katz Phoebe Yang